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May 13, 2022

VIA ECF

Honorable Sharon A. King, U.S.M.J.
Mitchell H. Cohen Building & U.S. Courthouse
One John F. Gerry Plaza
Fourth & Cooper Streets
Camden, NJ 08101

Re: Campagna, et al. v. TD Bank, N.A.
Civil Action No.: 1:20-cv-18533-KMW-SAK

Dear Judge King:

We, along with WilmerHale, represent Defendant TD Bank, N.A. ("TD Bank") in this action.

The Parties submit this joint letter to provide a status update to the Court. On May 5, 2022, the Parties participated in a mediation with Hon. Joel Rosen (Ret.) of Montgomery McCracken Walker & Rhoads LLP. The mediation was successful, resulting in an agreement in principle to resolve this matter on a classwide basis. To finalize the agreement, the Parties are preparing a formal settlement agreement, designing a notice plan, drafting proposed class notices, and identifying a proposed settlement administrator. Accordingly, the Parties request that this action be stayed in its entirety pending Plaintiffs' submission of a Motion for Preliminary Approval of Class Action Settlement. Plaintiffs anticipate filing that Motion by June 24, 2022.

We thank the Court for its time and attention to this matter.

Respectfully submitted,

BROWN & CONNERY, LLP

s/ Susan M. Leming
Susan M. Leming

cc: All Counsel of Record (via electronic filing)